

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JENNIFER Y. LANDHEART,
Plaintiff,

v.

**MIDLAND MORTGAGE, A DIVISION
OF MIDFIRST BANK AND MARY
BETH GILLIS CEO MIDLANND
MORTGAGE**
Defendants.

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CIVIL ACTION NO. 4:21-CV-01559

DEFENDANT 'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendant Midland Mortgage, A Division of MidFirst Bank, (“MidFirst or Defendant”), its successors and assigns files this Motion for Summary Judgment requesting the Court enter summary judgment on Plaintiff Jennifer Y. Landheart’s claims asserted in her First Amended Complaint, and would respectfully show unto the Court as follows:

MidFirst has separately filed its Brief in Support of this Motion Summary Judgment (the "Brief"), which MidFirst incorporates herein by reference.

WHEREFORE, MidFirst respectfully requests that the Court grant its Motion for Summary Judgment dismissing Plaintiff’s claims with prejudice and grant such other and further relief to which it may be justly entitled.

Respectfully Submitted,

**BARRETT DAFFIN FRAPPIER
TURNER & ENGEL, LLP**

/s/ Crystal Gee Gibson
Crystal Gee Gibson, *Attorney-in-Charge*
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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of January, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF filing system, and will send a true and correct copy to the following via the method indicated below:

Via E-service: colleen.mcclure@att.net
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/s/ Crystal G. Gibson
Crystal G. Gibson